

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Jessica M. Heinz, Esq,**
CIPRIANI & WERNER, P.C.
450 Sentry Parkway, Suite 200
Blue Bell, Pennsylvania 19422
Attorneys for Defendants Aurobindo Pharma, Ltd., Aurobindo Pharma USA, Inc., and
Aurolife Pharma, LLC (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of David Palew, Director of Supply Chain, on May 6 and 7, 2021, at 9:00 a.m. eastern standard time, and continuing until completion, at Cipriani & Werner, P.C., 450 Sentry Parkway, Suite 200, Blue Bell, Pennsylvania 19422, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 23, 2021

BURSOR & FISHER, P.A.

By: /s/ Andrew J. Obergfell
Andrew J. Obergfell

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EXHIBIT A

30(B)(6) TOPICS

Product Tracing

43. Tracing of batches and lots of Aurobindo's valsartan API sold downstream and ultimately intended for use by consumers in the United States. (the parties to meet and confer to identify relevant documents).
44. Tracing of batches and lots of Aurobindo's valsartan finished dose sold downstream and ultimately intended for use by consumers in the United States. (the parties to meet and confer to identify relevant documents).
45. The pricing of Aurobindo's valsartan API that was ultimately sold in the United States (the parties to meet and confer to identify relevant documents).
46. The pricing of Aurobindo's valsartan finished dose that was ultimately sold in the United States (the parties to meet and confer to identify relevant documents).
47. The gross and net profits to Aurobindo from the sale of Aurobindo's valsartan API in the United States (the parties to meet and confer to identify relevant documents).
48. The gross and net profits to Aurobindo from the sale of Aurobindo's valsartan finished dose in the United States (the parties to meet and confer to identify relevant documents).
49. The quantity/units of Aurobindo's valsartan finished dose sold in the United States (the parties to meet and confer to identify relevant documents).
50. Aurobindo's valsartan API sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days ahead of deposition during meet and confer process).
51. Aurobindo's valsartan finished dose sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days ahead of deposition during meet and confer process).

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for David Palew.
2. The complete production of David Palew's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

BURSOR & FISHER, P.A.

By: /s/ Andrew J. Obergfell
Andrew J. Obergfell

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